

1 Marc J. Randazza, Esq., CA Bar 269535
Randazza Legal Group
2 10620 S. Highlands Pkwy. #110-454
Las Vegas, NV 89141
3 888-667-1113
305-437-7662 (fax)
4 MJR@randazza.com

5 Attorney for Plaintiff,
6 LIBERTY MEDIA HOLDINGS, LLC

7 UNITED STATES DISTRICT COURT
8 SOUTHERN DISTRICT OF CALIFORNIA, SAN DIEGO DIVISION
9

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11 LIBERTY MEDIA HOLDINGS, LLC)
12 Plaintiff,)
13 vs.)
14 CARY TABORA AND SCHULYER)
15 WHETSTONE,)
16 Defendants.)
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Case No. 3:11-CV-00651-IEG -JMA

**DECLARATION OF ERIKA DILLON IN
SUPPORT OF PLAINTIFF’S OPPOSITION
TO MOTION TO DISMISS FOR LACK OF
JURISDICTION AND IMPROPER VENUE**

Judge: Hon. Irma E. Gonzalez

18 I, ERIKA DILLON, declare:

- 19 1. I am over the age of 18 and am a resident of the State of Nevada.
- 20 2. I have personal knowledge of the facts herein, and if called as a witness, could
21 testify competently thereto.
- 22 3. I am employed by the Plaintiff, Liberty Media Holdings, LLC, in Las Vegas,
23 Nevada.
- 24 4. I reviewed reports on Lexis Nexis concerning the Defendant, Cary Tabora,
25 including, but not limited to, his address, driver’s license and telephone numbers, all registered in
26 Florida. I received the information from Lexis Nexis indicating that Mr. Tabora is registered to
27 vote in Broward County in Davie, Florida; that he possesses a Florida driver’s license registered
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1 in Broward County in Davie, Florida; and that he has a telephone number with area code 954, the
2 area code serving the Broward County in Florida.

3 5. The above-mentioned reports are attached, in part, as Exhibit M to the
4 Opposition. I redacted personal information in this excerpted report out of desire by the Plaintiff
5 to keep Mr. Tabora's personal information out of the public record, but I can produce unredacted
6 copies upon request.

7 6. I also reviewed reports of the files that Mr. Tabora downloaded from Corbin
8 Fisher's website, which are regularly kept by the Plaintiff as business records. Upon examining
9 the records, it is clear that Mr. Tabora downloaded 157 videos from the Plaintiff's website, 144
10 of which contain title screens indicating that the company is based in San Diego, California. The
11 remaining 13 videos were older and listed Tampa, Florida as the location of the company.

12 Pursuant to the laws of the United States, I declare under penalty of perjury the foregoing
13 is true and correct.

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16 Dated: September 6, 2011 in Las Vegas, Nevada.

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20 ERIKA DILLON
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CERTIFICATE OF SERVICE

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I hereby certify that the foregoing document was filed using this Court's CM/ECF system on September 6 2011.

Date: September 6, 2011.



Erika Dillon
Liberty Media Holdings, LLC
4262 Blue Diamond Road #102-377
Las Vegas, NV 89139
erika@libertymediaholdings.com